

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ZHAOJIN DAVID KE,)	
)	
Plaintiff,)	Civil Action No. 08-268E
)	
V.)	
)	
EDINBORO UNIVERSITY OF PENNSYLVANIA; FRANK POGUE; JANET DEAN; TERRY SMITH; RIVA SHARPLES,)	Judge Sean J. McLaughlin
)	
Defendants.)	Electronically filed

NOW COMES Plaintiff, by his attorneys, and submits the following suggested questions for the Court to ask in voir dire:

1. Does any prospective juror have any obligations or plans that would interfere with serving on a jury if the trial were to extend into next week?
2. Does any prospective juror or a close friend or family member work in the legal field?
3. Does any prospective juror or a close friend or family member work for the Commonwealth of Pennsylvania in any position?
4. Does or has any prospective juror or a close friend or family member worked for Edinboro University of Pennsylvania?
5. Does any prospective juror or a close friend or family member hold a Ph.D. in any subject?
6. Has or does any prospective juror or a close friend or family member worked as a teacher or administrator at a college?
7. Did you or any close friend or family member major in English in college?

8. Do you know any English teachers or college professors who teach English?
9. Do you have a deeply held belief that would make you hesitate to award damages if the evidence shows that there was a violation of law?
10. Does any prospective juror have a deeply held belief that would preclude you from awarding damages against a Commonwealth of Pennsylvania agency such as Edinboro University of Pennsylvania?
11. Did you have relatives who were in the armed forces during the Korean conflict or do you know anybody who fought in Korean conflict?
12. Do you know any immigrants?
13. Do you feel that border control is being handles well?
14. Do legal immigrants who haven't been given citizenship deserve rights under the US Constitution?
15. Does the fact that this case involves a claim by an immigrant with a green card affect your ability to be impartial?
16. Do people from other countries deserve to have the right to work in the United States?
17. Have you heard of NAFTA?
18. Do you know what it is?
19. Were you for it or against it?
20. Would the fact that plaintiff was able to come to US because of NAFTA affect your ability to decide whether he should recover compensatory damages in this lawsuit?
21. Do you think the fact that plaintiff, who is now a United States citizen, is from another country and had a green card at the time he worked for the Defendant affect your ability to

decide this case?

22. Could you vote to hold Edinboro University of Pennsylvania liable for discriminating against someone who is not a citizen of the United States if the law and the evidence supported it?

Respectfully submitted,

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